



Eric Gonzalez
District Attorney

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KINGS COUNTY
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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: Michelle Martinez

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. PAUL GREGORY V. CITY OF NEW YORK, ET AL, 13-CV-3727 (JG) (CLP), FILED IN THE EASTERN DISTRICT OF NEW YORK
2. MOHAMMED BARRY V. CITY OF NEW YORK, ET AL, 20552-11, FILED IN KINGS COUNTY SUPREME COURT
3. JERRY STEVENS V. CITY OF NEW YORK, ET AL, 507039/2013, FILED IN KINGS COUNTY SUPREME COURT

THE PEOPLE ARE UNAWARE OF ANY PENDING OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County